

April 16, 2020

Hon. Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Heena Shim-Larkin v. City of New York
Docket No. 16 CV 6099 (AJN) (KNF)
Request for an extension of time

Dear Judge Alison J. Nathan:

I am Plaintiff Heena Shim-Larkin and writing to request for an extension of time to file Rule 72(a) objection concerning the oral orders made during the pre-motion conference on April 14, 2020, until May 29, 2020, pursuant to Your Honor's individual rules of practice 1.D. The current due date is April 28, 2020. This is the first request.

Parties consented that Plaintiff files her Rule 72(a) objection until May 29, 2020, and Defendant files its opposition to Plaintiff's objection until June 19, 2020.

First, since the orders dated April 14, 2020 were oral orders made during the pre-motion conference, getting the transcript is necessary to prepare the Rule 72(a) objection. And Plaintiff reasonably expects that it will take about one week to receive the transcript. But Plaintiff notes that Plaintiff does not know at this point whether current COVID-19 situation will delay the availability of the transcript or not.

Second, the law libraries are closed. Conducting legal research at the law library is necessary for Plaintiff to prepare the Rule 72(a) objection. Also, Plaintiff is not going outside of her apartment for the safety of herself and others following stay at home guidelines. Currently, New York State on PAUSE executive order has been extended until May 15, 2020. Therefore, Plaintiff reasonably expects that she will not be able to go to the law library at least until May 15, 2020. And Plaintiff wishes to have two weeks after May 15, 2020, if the situation resolves on or before May 15, 2020.


Plaintiff notes that if current situation persists beyond May 15, 2020, she might request additional extension(s) later on.

Accordingly, Plaintiff respectfully requests that the Court to extend the date for Plaintiff to file Rule 72(a) objection concerning the order dated April 14, 2020 until May 29, 2020, and Defendant's opposition due date until June 19, 2020, and order other reliefs which court deems just and proper.

SO ORDERED.

Respectfully submitted,

S/
Heena Shim-Larkin
Plaintiff *Pro Se*



SO ORDERED. 4/20/20
ALISON J. NATHAN, U.S.D.J.